

# EXHIBIT 1

**Kaycee L. Weeter**

---

**From:** Jason Denton <jdenton@rma-law.com>  
**Sent:** Monday, May 9, 2016 4:17 PM  
**To:** Kaycee L. Weeter  
**Cc:** Gerard Stranch; Daniel L. Clayton; Ben Gastel; eddie@dtlawfirm.com; jaykennamer@mcmahanlawfirm.com; byoung@elpolaw.com; mike@hugo-law.com; mark@markzamora.com; thousholder@sidgilreath.com; tom@hbsslaw.com; jgriffith@griffithroberts.com; Chalos, Mark P.; mike@lawmike.com; C. J. Gideon; Chris J. Tardio; Matt H. Cline; Shelli Meador  
**Subject:** Re: NECC Litigation - Meet and Confer

Kaycee,

I will not voluntarily dismiss my cases. We have already been down this issue before at the beginning of my cases before removal to Boston

Due to personal issues with my daughter I will be requesting an extension of time from the Court to respond to any motion you decide to file.

My responsive email should have provided you Notice that I am out of the office in May due to my ten year old having reconstructive skull surgery last week. She was in a PICU and Acute Care when you sent your email Friday afternoon.

Thank you,

Jason Denton

Sent from my iPhone

On May 9, 2016, at 1:47 PM, Kaycee L. Weeter <kaycee@gideoncooper.com> wrote:

Gerard:

What order are you referring to that imposes a stay on the non-bellwether cases? Please provide the docket number.

Thanks,

Kaycee

---

**From:** Gerard Stranch [mailto:gerards@bsjfirm.com]  
**Sent:** Monday, May 9, 2016 11:50 AM  
**To:** Daniel L. Clayton  
**Cc:** Kaycee L. Weeter; Ben Gastel; jdenton@rma-law.com; eddie@dtlawfirm.com; jaykennamer@mcmahanlawfirm.com; byoung@elpolaw.com; mike@hugo-law.com; mark@markzamora.com; thousholder@sidgilreath.com; tom@hbsslaw.com; jgriffith@griffithroberts.com; Chalos, Mark P.; mike@lawmike.com; C. J. Gideon; Chris J. Tardio; Matt H. Cline; Shelli Meador  
**Subject:** Re: NECC Litigation - Meet and Confer

We at BSJ also decline your request to dismiss our cases.

It appears that you are planning on moving against non-bellwether cases. Do you have an order lifting the stay on the non-bellwether cases? Did I miss a CMO that reopened this process?

Gerard

Sent from my iPhone

On May 9, 2016, at 11:17 AM, Daniel L. Clayton <dclayton@kcbattys.com> wrote:

Ms. Weeter,

To the extent that your email attempts to allege supposed procedural errors to cases filed by our law firm, please be advised that your law firm's interpretation and application of the THLCA is, once again, respectfully, misguided. As such, we will certainly not agree to a dismissal with prejudice on the grounds set forth in your email below.

Regards,

Daniel L. Clayton  
Certified Civil Trial and Medical Malpractice Specialist  
Kinnard Clayton & Beveridge  
127 Woodmont Boulevard  
Nashville, Tennessee 37205  
615.297.1007

[www.KinnardClaytonandBeveridge.com](http://www.KinnardClaytonandBeveridge.com)

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**From:** Kaycee L. Weeter [<mailto:kaycee@gideoncooper.com>]  
**Sent:** Friday, May 06, 2016 3:53 PM  
**To:** Gerard Stranch ([gerards@bsjfirm.com](mailto:gerards@bsjfirm.com)) <[gerards@bsjfirm.com](mailto:gerards@bsjfirm.com)>; Ben Gastel ([beng@bsjfirm.com](mailto:beng@bsjfirm.com)) <[beng@bsjfirm.com](mailto:beng@bsjfirm.com)>; Daniel L. Clayton <[dclayton@kcbattys.com](mailto:dclayton@kcbattys.com)>; [jdenton@rma-law.com](mailto:jdenton@rma-law.com); [eddie@dtlawfirm.com](mailto:eddie@dtlawfirm.com); [jaykennamer@mcmahanlawfirm.com](mailto:jaykennamer@mcmahanlawfirm.com); [byoung@elpolaw.com](mailto:byoung@elpolaw.com); [mike@hugo-law.com](mailto:mike@hugo-law.com); [mark@markzamora.com](mailto:mark@markzamora.com); [thousholder@sidgilreath.com](mailto:thousholder@sidgilreath.com); [tom@hbsslaw.com](mailto:tom@hbsslaw.com); [jgriffith@griffithroberts.com](mailto:jgriffith@griffithroberts.com); Chalos, Mark P. <[mchalos@lchb.com](mailto:mchalos@lchb.com)>; [mike@lawmike.com](mailto:mike@lawmike.com)  
**Cc:** C. J. Gideon <[cj@gideoncooper.com](mailto:cj@gideoncooper.com)>; Chris J. Tardio <[chris@gideoncooper.com](mailto:chris@gideoncooper.com)>; Matt H. Cline <[matt@gideoncooper.com](mailto:matt@gideoncooper.com)>  
**Subject:** NECC Litigation - Meet and Confer

All:

We intend to move to dismiss the following cases for non-compliance with Tenn. Code Ann. 29-26-122. Please let us know if you will agree to dismiss these cases with prejudice to obviate the need for filing the motions.

1. Adamson v. Ameridose, LLC, et al, No. 1:13-cv-12734;
2. Alexander v. Ameridose, LLC, et al, No. 1:13-cv-12428;
3. Altom v. Ameridose, LLC, et al, No. 1:13-cv-12619;
4. Barger v. Ameridose, LLC, et al, No. 1:13-cv-12619;
5. Barnard v. Ameridose, LLC, et al, No. 1:13-cv-12738;
6. Berry v. Ameridose, LLC, et al, No. 1:13-cv-12838;
7. Carman v. Ameridose, LLC, et al, No. 1:13-cv-12238;
8. Davis v. Ameridose, LLC, et al, No. 1:13-cv-12426;
9. Ellis v. Ameridose, LLC, et al, No. 1:13-cv-12619;
10. Gobble v. Ameridose, LLC, et al, No. 1:13-cv-12480;
11. Jones v. Ameridose, LLC, et al, No. 1:13-cv-12619;
12. Maddox v. Ameridose, LLC, et al, No. 1:13-cv-12619;
13. McWhorter v. Ameridose, LLC, et al, No. 1:13-cv-12619;
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15. Minor v. Ameridose, LLC, et al, No. 1:13-cv-12836;
16. Morris v. Ameridose, LLC, et al, No. 1:13-cv-12619;
17. Peay v. Ameridose, LLC, et al, No. 1:13-cv-12843;
18. Pierce v. Ameridose, LLC, et al, No. 1:13-cv-12733;
19. Redkevitch v. Ameridose, LLC, et al, No. 1:13-cv-12666;
20. Schulz v. Ameridose, LLC, et al, No. 1:13-cv-12311;
21. Siler v. Ameridose, LLC, et al, No. 1:13-cv-12489;
22. Smiley v. Ameridose, LLC, et al, No. 1:13-cv-12619;
23. Swann v. Ameridose, LLC, et al, No. 1:13-cv-12619;
24. Taylor v. Ameridose, LLC, et al, No. 1:13-cv-12673;
25. Temple v. Ameridose, LLC, et al, No. 1:13-cv-12696; and
26. Waddey v. Ameridose, LLC, et al, No. 1:13-cv-12619.

We intend to move to dismiss the following cases for non-compliance with Tenn. Code Ann. 29-26-121 (failure to send presuit notice or failure to wait the required 60 days before filing suit).

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9. Maddox v. Ameridose, LLC, et al, No. 1:13-cv-12619;
10. McWhorter v. Ameridose, LLC, et al, No. 1:13-cv-12619;
11. Minor v. Ameridose, LLC, et al, No. 1:13-cv-12836;
12. Morris v. Ameridose, LLC, et al, No. 1:13-cv-12619;
13. O'Brien v. Ameridose, LLC, et al, No. 1:13-cv-10460;
14. Peay v. Ameridose, LLC, et al, No. 1:13-cv-12843;
15. Redkevitch v. Ameridose, LLC, et al, No. 1:13-cv-12666;
16. Schulz v. Ameridose, LLC, et al, No. 1:13-cv-12311;
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For the cases that overlap between these two lists, we ask that you agree to dismiss them *with prejudice*.

Please respond by the close of business Tuesday, May 10. If we do not hear from you, we will assume that you do not agree to the above requests.

Thanks,

Kaycee Weeter

Kaycee L. Weeter, Esq.  
Gideon, Cooper & Essary, PLC  
Suite 1100  
315 Deaderick St.  
Nashville, TN 37238  
Phone: 615.254.0400  
Fax: 615.254.0459

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**Kaycee L. Weeter**

---

**From:** Mike@hugo-law.com  
**Sent:** Thursday, May 12, 2016 5:30 AM  
**To:** Jason Denton  
**Cc:** Kaycee L. Weeter; Gerard Stranch; Daniel L. Clayton; Ben Gastel; eddie@dttlawfirm.com; jaykenamer@mcmahanlawfirm.com; byoung@elpolaw.com; mark@markzamora.com; thousholder@sidgilreath.com; tom@hbsslw.com; jgriffith@griffithroberts.com; Chalos, Mark P.; mike@lawmike.com; C. J. Gideon; Chris J. Tardio; Matt H. Cline; Shelli Meador  
**Subject:** Re: NECC Litigation - Meet and Confer

Still waiting for a response tinny original email.

**Michael R. Hugo**  
617-448-4888 (Direct)

Sent from my iPhone, so please excuse misspellings, grammar and sarcasm.

On May 9, 2016, at 5:17 PM, Jason Denton <jdenton@rma-law.com> wrote:

Kaycee,

I will not voluntarily dismiss my cases. We have already been down this issue before at the beginning of my cases before removal to Boston

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**To:** Daniel L. Clayton

**Cc:** Kaycee L. Weeter; Ben Gastel; [jdenton@rma-law.com](mailto:jdenton@rma-law.com); [eddie@dtlawfirm.com](mailto:eddie@dtlawfirm.com); [jaykennamer@mcmahanlawfirm.com](mailto:jaykennamer@mcmahanlawfirm.com); [byoung@elpolaw.com](mailto:byoung@elpolaw.com); [mike@hugo-law.com](mailto:mike@hugo-law.com); [mark@markzamora.com](mailto:mark@markzamora.com); [thousholder@sidgilreath.com](mailto:thousholder@sidgilreath.com); [tom@hbsslaw.com](mailto:tom@hbsslaw.com); [jgriffith@griffithroberts.com](mailto:jgriffith@griffithroberts.com); Chalos, Mark P.; [mike@lawmike.com](mailto:mike@lawmike.com); C. J. Gideon; Chris J. Tardio; Matt H. Cline; Shelli Meador

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Kinnard Clayton & Beveridge  
127 Woodmont Boulevard  
Nashville, Tennessee 37205  
615.297.1007

[www.KinnardClaytonandBeveridge.com](http://www.KinnardClaytonandBeveridge.com)

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**From:** Kaycee L. Weeter [mailto:kaycee@gideoncooper.com]

**Sent:** Friday, May 06, 2016 3:53 PM

**To:** Gerard Stranch (gerards@bsjfirm.com) <gerards@bsjfirm.com>; Ben Gastel (beng@bsjfirm.com) <beng@bsjfirm.com>; Daniel L. Clayton <dclayton@kcbattys.com>; jdenton@rma-law.com; eddie@dttlawfirm.com; jaykennamer@mcmahanlawfirm.com; byoung@elpolaw.com; mike@hugo-law.com; mark@markzamora.com; thousholder@sidgilreath.com; tom@hbsslaw.com; jgriffith@griffithroberts.com; Chalos, Mark P. <mchalos@lchb.com>; mike@lawmike.com

**Cc:** C. J. Gideon <cj@gideoncooper.com>; Chris J. Tardio <chris@gideoncooper.com>; Matt H. Cline <matt@gideoncooper.com>

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18. Pierce v. Ameridose, LLC, et al, No. 1:13-cv-12733;
19. Redkevitch v. Ameridose, LLC, et al, No. 1:13-cv-12666;
20. Schulz v. Ameridose, LLC, et al, No. 1:13-cv-12311;
21. Siler v. Ameridose, LLC, et al, No. 1:13-cv-12489;
22. Smiley v. Ameridose, LLC, et al, No. 1:13-cv-12619;
23. Swann v. Ameridose, LLC, et al, No. 1:13-cv-12619;
24. Taylor v. Ameridose, LLC, et al, No. 1:13-cv-12673;
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11. Minor v. Ameridose, LLC, et al, No. 1:13-cv-12836;
12. Morris v. Ameridose, LLC, et al, No. 1:13-cv-12619;
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Thanks,

Kaycee Weeter

Kaycee L. Weeter, Esq.  
Gideon, Cooper & Essary, PLC  
Suite 1100  
315 Deaderick St.  
Nashville, TN 37238  
Phone: 615.254.0400  
Fax: 615.254.0459

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IMPORTANT: This communication from the law firm of Branstetter, Stranch & Jennings, PLLC is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, and contains information that may be confidential and privileged. Be advised that if you are not the intended recipient(s), any dissemination, distribution or copying of this communication is prohibited. Please notify the undersigned immediately by telephone or return e-mail.

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**Kaycee L. Weeter**

---

**From:** Kaycee L. Weeter  
**Sent:** Thursday, May 12, 2016 8:17 AM  
**To:** mike@hugo-law.com  
**Cc:** Matt H. Cline  
**Subject:** Fwd: NECC Litigation - Meet and Confer

Mike:

See below. I responded to your email last Friday.

Kaycee

Begin forwarded message:

**From:** "Kaycee L. Weeter" <kaycee@gideoncooper.com>  
**Date:** May 6, 2016 at 4:32:48 PM CDT  
**To:** Michael R Hugo <mike@hugo-law.com>  
**Cc:** "Matt H. Cline" <matt@gideoncooper.com>  
**Subject:** RE: NECC Litigation - Meet and Confer

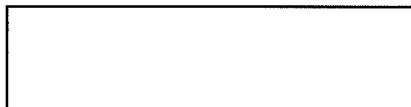
You and Mark Zamora are listed as counsel of record for *Gobble*.

**From:** Michael R Hugo [mailto:mike@hugo-law.com]  
**Sent:** Friday, May 6, 2016 4:05 PM  
**To:** Kaycee L. Weeter  
**Subject:** Re: NECC Litigation - Meet and Confer

I have received your email, and am wondering which case(s) you have me listed on as counsel of record.

**Michael R. Hugo, Esq**  
1 Catherine Road  
Framingham, MA 01701

Tel: 617-448-4888  
Fax: 617-607-9655  
Email: [mike@hugo-law.com](mailto:mike@hugo-law.com)



*Listed in MA Super Lawyers 2009 - Present*

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On May 6, 2016, at 4:53 PM, Kaycee L. Weeter <[kaycee@gideoncooper.com](mailto:kaycee@gideoncooper.com)> wrote:

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18. Pierce v. Ameridose, LLC, et al, No. 1:13-cv-12733;
19. Redkevitch v. Ameridose, LLC, et al, No. 1:13-cv-12666;
20. Schulz v. Ameridose, LLC, et al, No. 1:13-cv-12311;

21. Siler v. Ameridose, LLC, et al, No. 1:13-cv-12489;

22. Smiley v. Ameridose, LLC, et al, No. 1:13-cv-12619;

23. Swann v. Ameridose, LLC, et al, No. 1:13-cv-12619;

24. Taylor v. Ameridose, LLC, et al, No. 1:13-cv-12673;

25. Temple v. Ameridose, LLC, et al, No. 1:13-cv-12696; and

26. Waddey v. Ameridose, LLC, et al, No. 1:13-cv-12619.

We intend to move to dismiss the following cases for non-compliance with Tenn. Code Ann. 29-26-121 (failure to send presuit notice or failure to wait the required 60 days before filing suit).

1. Adamson v. Ameridose, LLC, et al, No. 1:13-cv-12734;
2. Altom v. Ameridose, LLC, et al, No. 1:13-cv-12619;
3. Barger v. Ameridose, LLC, et al, No. 1:13-cv-12619;
4. Carman v. Ameridose, LLC, et al, No. 1:13-cv-12238;
5. Denson v. Ameridose, LLC, et al, No. 1:13-cv-12729;
6. Ellis v. Ameridose, LLC, et al, No. 1:13-cv-12619;
7. Gobble v. Ameridose, LLC, et al, No. 1:13-cv-12480;
8. Jones v. Ameridose, LLC, et al, No. 1:13-cv-12619;
9. Maddox v. Ameridose, LLC, et al, No. 1:13-cv-12619;
10. McWhorter v. Ameridose, LLC, et al, No. 1:13-cv-12619;
11. Minor v. Ameridose, LLC, et al, No. 1:13-cv-12836;
12. Morris v. Ameridose, LLC, et al, No. 1:13-cv-12619;
13. O'Brien v. Ameridose, LLC, et al, No. 1:13-cv-10460;
14. Peay v. Ameridose, LLC, et al, No. 1:13-cv-12843;
15. Redkevitch v. Ameridose, LLC, et al, No. 1:13-cv-12666;
16. Schulz v. Ameridose, LLC, et al, No. 1:13-cv-12311;
17. Siler v. Ameridose, LLC, et al, No. 1:13-cv-12489;
18. Smiley v. Ameridose, LLC, et al, No. 1:13-cv-12619;
19. Swann v. Ameridose, LLC, et al, No. 1:13-cv-12619; and
20. Waddey v. Ameridose, LLC, et al, No. 1:13-cv-12619.

For the cases that overlap between these two lists, we ask that you agree to dismiss them *with prejudice*.

Please respond by the close of business Tuesday, May 10. If we do not hear from you, we will assume that you do not agree to the above requests.

Thanks,

Kaycee Weeter

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